



KING, TILDEN, MCETTRICK & BRINK, P.C.  
Attorneys at Law

**Hugh C.M. Brady, Esq.**

Shareholder

Admitted in Massachusetts, New York, Eastern District of New York & Southern District of New York

hbrady@ktmpc.com

350 Granite Street, Suite 2204, Braintree, MA 02184

TEL 617.770.2214 FAX 617.774.1714

January 10, 2022

**VIA ECF ONLY**

Chief Magistrate Judge Cheryl L. Pollak  
United States Courthouse  
Eastern District of New York  
225 Cadman Plaza E,  
Brooklyn, NY 11201

Re: Allstate Ins. Co. et al. v. Offenbacher et al., C.A. No. 1:21-cv-01013-FB-CLP  
Stay of Third Party Discovery, Conference/Hearing on Third Party Subpoenas and  
Parties' Stipulated Confidentiality Agreement and Protective Order (ECF No. 67)

Dear Chief Magistrate Judge Pollak:

King, Tilden, McEttrick & Brink, P.C. represents Allstate Insurance Company, Allstate Property & Casualty Insurance Company, Allstate Fire & Casualty Insurance Company, and Allstate Indemnity Company (collectively, "Allstate") in the above-referenced matter. Allstate submits this letter as a request to extend today's deadline to finalize settlement and file stipulations of dismissal in the above-captioned matter.

Allstate is simply waiting for complete execution of the settlement agreement(s) by Defendants, Offenbacher and Bank. Allstate attempted to secure execution prior to today's deadline, but could not. Allstate attempted to confer with the Defendants today, but has not heard back from counsel. As such, Allstate, respectfully requests until January 20, 2022 to obtain the signatures necessary to file stipulations of dismissal.

This is the first request for an extension of this deadline. Thank you for your time and attention to the foregoing.

Respectfully submitted,

/s/ *Hugh C.M. Brady, Esq.*

Hugh C.M. Brady, Esq.  
Attorney for Allstate

cc: All parties of record (via ECF filing only)